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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

Blue Moon Property Group, LLC

Debtor-in-Possession.

Case No. 22-31873-thp11

DEBTOR'S SUBMISSIONS PURSUANT TO
ORDER SETTING SCHEDULING AND
CASE MANAGEMENT CONFERENCE

Pursuant to the Order of this Court, Debtor-in-Possession, Blue Moon Property Group, LLC ("Debtor"), hereby submits the following:

1. The following is a short narrative of the details the efforts the Debtor has undertaken and will undertake to attain a consensual plan of reorganization: Debtor's effort to reorganize will be primarily driven by the sale of the real property located at 3220 Southshore Blvd, Lake Oswego, Oregon (the "Property"), in order to pay accrued expenses and facilitate payment in full to all creditors. The Property was originally listed for sale by the Debtor's parent company, Brilliant Homes, LLC, for \$2,790,000 after a substantial effort to rehabilitate and improve the Property. Aggressive marketing to facilitate a sale has been undertaken pre-petition (reductions to \$2,690,000 on 9/17/22 and \$2,490,000 on 10/4/22). After transfer of the Property to the Debtor, this pattern continued with a price reduction to

\$2,290,000 shortly after the filing of the petition and a more recent reduction to \$2,150,000. Consistent with the above, Debtor intends to file with the Court its Application for Authority to Employ Realtor (Mary Jo Avery of Avery Bunick Luxury Properties, Inc.), which will include the listing agreement that sets forth the post-petition pricing changes.

2. Debtor's cash flow analysis, prepared on a monthly basis, from the petition date (November 9, 2022) through March 9, 2023 is attached as **Exhibit A** and incorporated herein by this reference.

3. The Court's request for Debtor's financial information regarding the Debtor for the past three (3) years is not applicable as Debtor began operation on November 8, 2022. There is no significant seasonal variation in Debtor's income and expenses.

4. A statement of the income and expenses of the Debtor since the filing of the petition is attached as **Exhibit B** and incorporated herein by this reference. Expenses have been and are being paid in the ordinary course of business.

5. Debtor expects to employ the following professionals during the course of the reorganization:

- a. Vanden Bos & Chapman, LLP (Debtor's general counsel).
- b. Mary Jo Avery of Avery Bunick Luxury Properties, Inc.

6. Attached as **Exhibit C** is the monthly budget for the anticipated fees and expenses of Vanden Bos & Chapman, LLP during the Chapter 11 case. The attached budget for the professional is an estimate only; the budget is not intended to establish either a minimum or maximum that might be charged by the professional. The professional

reserves the right to seek compensation in amounts above the attached budgets if the time expended exceeds the estimates.

DATED: December 6, 2022

VANDEN BOS & CHAPMAN, LLP

By: /s/Douglas R. Ricks
Douglas R. Ricks, OSB #044026
Of Attorneys for Debtor-in-Possession

BLUE MOON PROPERTY GROUP, LLC

CASH FOR ANALYSIS

(11/09/22 - 03/09/2023)

	November	December	January	February	March
Cash In					
	\$0	\$0			
Deposit			\$20,000		
Rent				\$10,000	\$10,000
Cash Out					
PGE	\$472	\$490	\$490	\$490	\$490
Landscapers	\$400	\$400	\$400	\$400	\$400
City of Lake Oswego	\$150	\$150	\$150	\$150	\$150
NW Natural	\$35	\$50	\$50	\$50	\$50
Law, Deam, Pans	\$675	\$675	\$675	\$675	\$675
Mr. Cooper	\$1,223.88	\$1,223.88	\$1,223.88	\$1,223.88	\$1,223.88
Outflow	\$2,956	\$2,989	\$2,989	\$2,989	\$2,989
Monthly Cashflow	-\$2,956	-\$2,989	\$17,011	\$7,011	\$7,011

BLUE MOON PROPERTY GROUP, LLC

STATEMENT OF INCOME AND EXPENSES

November 9th-December 6th	
INCOME	
	\$0
EXPENSES	
PGE	\$472
Landscapers	\$400
City of Lake Oswego	\$150
NW Natural	\$35
Accrued Interest Creditor	
Law, Deam, Pans	\$675
Mr. Cooper	\$1,223.88
Total Expenses	\$2,956

**Estimated Professional Fees
11/2022 - 04/2022**

Professional	November-22	December-22	January-23	February-23	March-23	April-23	Total
Vanden Bos & Chapman, LLP*	\$7,500.00	\$7,500.00	\$7,500.00	\$5,000.00	\$5,000.00	\$2,500.00	\$35,000.00
Avery Bunick Luxury Properties, Inc.*	\$0.00	\$0.00	\$0.00	\$0.00	\$105,000.00	\$0.00	\$105,000.00

CERTIFICATE - TRUE COPY

DATE: December 6, 2022

DOCUMENT: CASE MANAGEMENT SUBMISSION

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

Blue Moon Property Group, LLC
Attn: Ronald Sapp
17600 Pacific Hwy Unit 338
Marylhurst, OR 97036

by mailing a copy of the above-named document to each of the above in a sealed envelope addressed to the last known address. Each envelope was deposited into the postal system at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: December 6, 2022

VANDEN BOS & CHAPMAN, LLP

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